

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

In re:
KRISJENN RANCH, LLC
Debtor

§ § § §

Chapter 11

Case No. 20-50805

**KRISJENN RANCH, LLC and
KRISJENN RANCH, LLC-SERIES
UVALDE RANCH, and KRISJENN
RANCH, LLC-SERIES PIPELINE
ROW as successors in interest to
BLACKDUCK PROPERTIES, LLC,
*Plaintiffs***

§ § § § §

V.

§§

**DMA PROPERTIES, INC., and
LONGBRANCH ENERGY, LP,
Defendants**

§§§

Adversary No. 20-05027

DMA PROPERTIES, INC
Cross-Plaintiff/Third Party Plaintiff

§

V.

§ 2

**KRISJENN RANCH, LLC,
KRISJENN RANCH, LLC-SERIES
UVALDE RANCH, and KRISJENN
RANCH, LLC-SERIES PIPELINE ROW,
BLACK DUCK PROPERTIES, LLC,
LARRY WRIGHT, and JOHN TERRILL
*Cross-Defendants/Third-Party
Defendants***

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**Adversary No. 20-05027**

**SUPPLEMENT TO KRISJENN RANCH, LLC, KRISJENN RANCH, LLC-SERIES  
UVALDE RANCH, AND KRISJENN RANCH, LLC-SERIES PIPELINE ROW, AS  
SUCCESSORS IN INTEREST TO BLACK DUCK PROPERTIES, LLC’S RESPONSE  
TO DMA PROPERTIES, INC.’S MOTION FOR PARTIAL SUMMARY JUDGMENT  
ON DMA’S OWNERSHIP INTEREST IN THE BIGFOOT NOTE PAYMENTS**

TO THE HONORABLE CHIEF BANKRUPTCY JUDGE RONALD B. KING:

COME NOW Debtors, Plaintiffs, and Counter-Defendants KrisJenn Ranch, LLC, KrisJenn Ranch, LLC-Series Uvalde Ranch, and KrisJenn Ranch, LLC-Series Pipeline Row, as successors in interest to Black Duck Properties, LLC (collectively the “Debtors”), files this Supplement to Debtors’ Response to Motion for Partial Summary Judgment on DMA’s Ownership Interest in the Bigfoot Note Payments, which was inadvertently missing from Debtors’ Response to DMA’s Motion for Partial Summary Judgment on DMA’s Ownership Interest in the Bigfoot Note Payments, and would respectfully attach as follows:

1. Exhibit D to KrisJenn Ranch, LLC, KrisJenn Ranch, LLC-Series Uvalde Ranch, and KrisJenn Ranch, LLC-Series Pipeline Row, as Successors In Interests to Black Duck Properties, LLC’s Response to DMA Properties, Inc.’s Motion for Partial Summary Judgment on DMA’s Ownership Interest in the Bigfoot Note Payments

WHEREFORE PREMISES CONSIDERED Debtors pray that this Court grant leave to supplement with the attached Exhibit D and for all other such further relief to which they may be entitled.

Dated: October 7, 2020

Respectfully submitted,

**MULLER SMEBERG, PLLC**

By: /s/ John Muller  
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ATTORNEY FOR DEBTORS

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document was served on all counsel of record by way of e-service through the CM/ECF system by notice of electronic filing or via email on the 7th day of October 2020:

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shane.p.tobin@usdoj.gov  
United States Trustee

/s/ John Muller  
C. John Muller IV

# **EXHIBIT D**

To: Daniel Moore <[palmettolandandfarms@hotmail.com](mailto:palmettolandandfarms@hotmail.com)>

Cc: Hagan Cohle <[hscohle@yahoo.com](mailto:hscohle@yahoo.com)>, Rod Roberts <[rod@lancerresources.com](mailto:rod@lancerresources.com)>, Larry  
<[larrymwright54@yahoo.com](mailto:larrymwright54@yahoo.com)>, Darin Borders <[darinborders@gmail.com](mailto:darinborders@gmail.com)>

Subject: Re: The Express Gas Pipeline, LP to Black Duck Properties, LLC

Mr. Moore,

I am dealing directly with Mr. Wright. I will defer your email to Mr. Wright.

-----  
Chase Palmer  
Palmer Law Firm, Inc.

[301 N. Wellington Street](#)  
Marshall, Texas 75670  
Phone - (903)935-9303

Fax - (903)935-0822

CONFIDENTIALITY NOTICE : THIS MESSAGE CONTAINS INFORMATION THAT IS PRIVILEGED, CONFIDENTIAL AND EXEMPT FROM DISCLOSURE UNDER APPLICABLE LAW AND IS INTENDED ONLY FOR THE USE OF THE INDIVIDUAL OR ENTITY TO WHICH IT IS ADDRESSED.

IF THE READER OF THIS MESSAGE IS NOT THE INTENDED RECIPIENT, OR THE EMPLOYEE OR AGENT RESPONSIBLE FOR DELIVERING THE MESSAGE TO THE INTENDED RECIPIENT, YOU ARE HEREBY NOTIFIED THAT ANY DISSEMINATION, DISTRIBUTION OR COPYING OF THIS COMMUNICATION IS STRICTLY PROHIBITED AND REVIEW BY ANYONE OTHER THAN THE INTENDED RECIPIENT SHALL NOT CONSTITUTE WAIVER OF THE ATTORNEY-CLIENT, WORK PRODUCT AND/OR OTHER APPLICABLE PRIVILEGES. IF YOU HAVE RECEIVED THIS COMMUNICATION IN ERROR, PLEASE NOTIFY SENDER IMMEDIATELY BY TELEPHONE AND DELETE THE MESSAGE FROM YOUR SYSTEM.

On Fri, Jul 14, 2017 at 3:15 PM, Daniel Moore <[palmettolandandfarms@hotmail.com](mailto:palmettolandandfarms@hotmail.com)> wrote:

Let me try again. We all expected things that didn't happen and would have appreciated a lot. Darren Borders tells me Rod says if we do not have the sign documents by 2pm then the deal is dead and he is keeping Larry's f\_\_\_\_\_ing money. Simple question: Are you telling me that if I do not personally send you the signature w notary today or Monday then your group's illusion or opinion is that Larry's out of his money and the deal is off? I am traveling across country with 3 kids, dogs, wife etc.. I have never dealt with demands like yours before. You run a hard line when it's time to sign shit the way you want it... but do nothing to put documents together when requested by the group that's paid \$925k ... what is your stance? I am ready to quit the kitty shit.

Sent from my Verizon, Samsung Galaxy smartphone

----- Original message -----

From: Chase Palmer <[cpalmerplf@gmail.com](mailto:cpalmerplf@gmail.com)>

Date: 7/14/17 3:49 PM (GMT-05:00)

To: Daniel Moore <[palmettolandandfarms@hotmail.com](mailto:palmettolandandfarms@hotmail.com)>

Cc: Hagan Cohle <[hscohle@yahoo.com](mailto:hscohle@yahoo.com)>, Rod Roberts <[rod@lancerresources.com](mailto:rod@lancerresources.com)>, Larry <[larrymwright54@yahoo.com](mailto:larrymwright54@yahoo.com)>, Darin Borders <[darinborders@gmail.com](mailto:darinborders@gmail.com)>

Subject: Re: The Express Gas Pipeline, LP to Black Duck Properties, LLC

Mr. Moore,

Please have the document executed and returned as soon as possible, preferably today. If you can stop at a bank and sign the document before a Notary and have them fax that signature page to my fax number (903-930-0822), that would be appreciated and expected.

-----  
Chase Palmer  
Palmer Law Firm, Inc.

[301 N. Wellington Street](#)  
Marshall, Texas 75670  
Phone - (903)935-9303

Fax - (903)935-0822

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On Fri, Jul 14, 2017 at 2:43 PM, Daniel Moore <[palmettolandandfarms@hotmail.com](mailto:palmettolandandfarms@hotmail.com)> wrote:

Chase, I am traveling to SC. Will you accept Larry's signature on behalf of Black Duck Properties? Or do you insist on my signature with notary today?

Sent from my Verizon, Samsung Galaxy smartphone

----- Original message -----

From: Chase Palmer <[cpalmerplf@gmail.com](mailto:cpalmerplf@gmail.com)>

Date: 7/14/17 3:17 PM (GMT-05:00)

To: Hagan Cohle <[hscohle@yahoo.com](mailto:hscohle@yahoo.com)>, Rod Roberts <[rod@lancerresources.com](mailto:rod@lancerresources.com)>